

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276, 217-782-3397
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601, 312-814-6026

ROD R. BLAGOJEVICH, GOVERNOR

RENEE CIPRIANO, DIRECTOR

217/524-3300

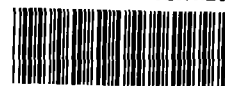
June 30, 2005

Certified Mail

7002 3150 0000 1253 1556

Mr. Steven Beaudoin
University of Chicago
5555 South Ellis Avenue
Chicago, Illinois 60637

US EPA RECORDS CENTER REGION 5



1002108

Re: 0316410001 -- Cook County
University of Chicago Hospital
Laboratory Services Building
ILD005421136
Log No.: B-130-M-3
RCRA Permit File

Dear Mr. Beaudoin:

This is in response to the revised closure plan dated February 28, 2002 and received March 18, 2002 and the supplement to the revised closure plan dated April 8, 2005 and received May 4, 2005 submitted by EDI on behalf of the University of Chicago. These submittals addressed the closure of four container storage rooms (i.e. container storage area) in the Laboratory Services Building at the above-referenced facility.

A plan to close the subject unit was initially approved by Illinois EPA on July 15, 1991 in the facility's RCRA Permit (Log No. B-130). The revised closure plan was considered a Class 1* permit modification.

Your request to modify the approved closure plan for the hazardous waste management unit(s) mentioned above is hereby approved subject to the following conditions and modifications:

1. Except as modified by this letter, closure activities shall be carried out in accordance with the revised closure plan dated April 8, 2005.
2. Closure activities should be completed by October 1, 2005. In accordance with 35 Ill. Adm. Code 724.215, when closure is complete a certification must be submitted to Illinois EPA by the owner/operator and an independent professional engineer that the hazardous waste management units at the facility have been closed in accordance with the specifications in the approved closure plan. This certification should be received at the

Illinois EPA within sixty (60) days after closure, or by November 30, 2005. These dates may be revised if the University of Chicago finds that additional time is necessary to complete all required closure activities and demonstrates to the Illinois EPA in a closure plan modification request that it is attempting to complete closure in a timely manner.

The attached closure certification form must be used. Signatures must meet the requirements of 35 Ill. Adm. Code 702.126. The independent engineer should be present at all critical, major points (activities) during the closure. These might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for the units approved for closure herein until the Illinois EPA approves the facility's closure certification.

The Professional Engineering Practice Act (225 Illinois Compiled Statutes 325/1-325/49) requires that any person who practices professional engineering in the State of Illinois or implies that he (she) is a professional engineer must be licensed under that Act. Therefore, any certification or engineering services which are performed for a closure plan in the State of Illinois must be done by an Illinois P.E.

Plans and specifications, designs, drawings, reports, and other documents rendered as professional engineering services, and revisions of the above must be sealed and signed by a professional engineer in accordance with Paragraph 325/14 of the Professional Engineering Practice Act.

As part of the closure certification, to document the closure activities at your facility in accordance with 35 Ill. Adm. Code 724.215, a Closure Documentation Report must be developed and submitted to Illinois EPA along with the closure certification statement which includes the following:

- a. Background information about the facility overall and the overall closure project.
- b. A description of the unit(s) closed (include scaled maps showing location of unit(s) within facility and layout of unit(s), information related to construction of the unit(s), identification of wastes managed in the unit(s)).
- c. A chronological discussion of all closure activities and what was accomplished as a result of completing these activities.
- d. The volume of waste, waste residue and contaminated soil (if any) removed. The term 'waste' includes wastes resulting from decontamination activities.
- e. A description of the method of waste handling and transport.

- f. The waste manifest numbers.
 - g. Copies of the waste manifests.
 - h. Information documenting the results of all sampling/analysis efforts. The goal of presenting this information should be to describe, in a logical manner, the activities and results associated with the sampling/analysis effort. At a minimum, this information must include:
 - (1) Identification of the reason for the sampling/analysis effort and the goals of the effort;
 - (2) A summary in tabular form of all analytical data, including all quality assurance/quality control data;
 - (3) Identification of the test method used and detection limits achieved, including sample preparation, sample dilution (if necessary) and analytical inferences;
 - (4) Copies of the final laboratory report sheets, including final sheets reporting all quality assurance/quality assurance dates;
 - (5) A summary of all procedures used for quality assurance/quality control, including the results of these procedures; and
 - (6) A discussion of the data, as it relates to the overall goal of the sampling/analysis effort.
 - i. Information demonstrating that the remediation objectives approved for the project have been achieved.
 - j. Color photo documentation of closure. Document conditions before, during and after closure.
 - k. A detailed summary of the costs incurred in completing the required closure activities.
3. Closure efforts at this facility must meet the requirements of 35 Ill. Adm. Code 724, Subpart G. Any variation to the closure activities approved by this letter shall be the subject of a request to modify the approved closure plan and submitted to Illinois EPA for review and approval. Any such request must include a completed LPC-PA23 Form, and contain detailed information regarding the proposed modifications and the procedures that will be followed to complete closure of the unit(s). In addition, this request must contain information demonstrating that the proposed modifications meet the requirements of 35 Ill. Adm. Code 724, Subpart G. A revised schedule for completing the various tasks necessary to complete closure must be included in this request.

4. The concrete surfaces of the container storage area shall be visually inspected, photographed before, during and after decontamination. Any residue adhering to the surface must be removed by scraping and/or brushing. Following this, the concrete surfaces must be steam cleaned and triple rinsed. All wash and rinse water shall be collected and managed in accordance with the requirements of (1) 35 Ill. Adm. Code, Subtitle G: Waste Disposal; and/or (2) 35 Ill. Adm. Code, Subtitle C: Water Pollution.

After cleaning the concrete surfaces, an independent licensed professional engineer shall inspect the integrity of the concrete surfaces. These surfaces shall be inspected for cracks that penetrate through the concrete surface. In addition, all construction joints must be inspected to ensure they are watertight. This inspection must be carried out in accordance with standards and recommendations of professional/technical entities such as the American Concrete Institute, the Portland Cement Association the American Society for Testing and Materials, the American Society of Civil Engineers, etc. which relate to the ability of concrete structures to contain liquids. The results of this inspection shall be: (1) submitted in the form of a report; (2) included in the closure documentation report required by Condition 2, and (3) certified in accordance with 35 Ill. Adm. Code 702.126 by the engineer. The report must include: (1) the results of the inspection; (2) scaled drawings showing the location of all cracks and construction joints observed during the investigation; (3) conclusions reached regarding any cracks or construction joints observed in the areas of concern; (4) justification for the conclusions reached (e.g., information must be provided which indicates that any construction joints in the areas of concern are indeed watertight); and (5) photographs to support the conclusions reached.

5. If joints, cracks or other defects are found in the concrete surfaces in the container storage area during the inspection required by Condition 4 above which could potentially allow hazardous waste or hazardous constituents to migrate through them, the University of Chicago must submit a plan to sample the soil under the cracks or defects to determine if hazardous waste or hazardous constituents have been released to the underlying soil. This sampling/analysis effort shall be developed in accordance with the Illinois EPA document entitled Guidance for Preparing RCRA Closure Plans that is available on the Illinois EPA web site. The sampling plan must be submitted as a request to modify the closure plan and include a completed LPC-PA23 Form.
6. All waste generated as part of this project must be managed in accordance with the requirements of 35 Ill. Adm. Code 721, 722, 723, 728, 808 and 809.
7. All hazardous wastes that result from this project are subject to annual reporting as required in 35 IAC 722.141 and shall be reported to the Illinois EPA by March 1 of the following year for wastes treated and left on-site or shipped off-site for storage, treatment

and/or disposal during any calendar year. All non-hazardous special wastes that are shipped to a facility located outside the State of Illinois that result from this project are subject to annual reporting as required in Section 22.01 of the Illinois Environmental Protection Act and 35 Ill. Adm. Code 809.601(g) and shall be reported to Illinois EPA by February 1 of the following year. Additional information and appropriate report forms may be obtained from the Illinois EPA by contacting:

Facility Reporting Unit
Bureau of Land #24
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62794-9276

8. If the Illinois EPA determines that implementation of this closure plan fails to satisfy the requirements of 35 Ill. Adm. Code 724.211, the Illinois EPA reserves the right to amend the closure plan. Revisions of closure plans are subject to the appeal provisions of Section 40 of the Illinois Environmental Protection Act.
9. A request for release of financial assurance documents should be included with the closure certification documents.
10. Under the provisions of 29 CFR 1910, cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of 40 hours of safety and health training off site plus a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.

This action shall constitute Illinois EPA's final action on the subject submittal. The original and two (2) copies of all certifications, logs, or reports which are required to be submitted to the Illinois EPA by the facility should be mailed to the following address:

Illinois Environmental Protection Agency
Bureau of Land -- #33
Permit Section
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

Work required by this letter, your submittal(s) or the regulations may also be subject to other laws governing professional services, such as the Illinois Professional Land Surveyor Act of 1989, the Professional Engineering Practice Act of 1989, the Professional Geologist Licensing Act, and the Structural Engineering Licensing Act of 1989. This letter does not relieve anyone from compliance with these laws and the regulations adopted pursuant to these laws. All work that falls within the scope and definitions of these laws must be performed in compliance with them. The Illinois EPA may refer any discovered violation of these laws to the appropriate regulating authority.

Should you have any questions regarding this matter, please contact Rob Watson, P.E. at 217-524-3265.

Sincerely,



Joyce L. Munie, P.E.
Manager, Permit Section
Bureau of Land

JLM:WRW:mls/051902s.doc

WRW, JLM
Attachments: Closure Certification Statement

cc: EDI - Marcella Bondie
USEPA Region V -- Harriet Croke

CLOSURE CERTIFICATION STATEMENT

University of Chicago -- Cook

Closure Log B-130-M-3

To meet the requirements of 35 Ill. Adm. Code 725.215, this statement is to be completed by both a responsible officer of the owner/operator (as defined in 35 Ill. Adm. Code 702.126) and by an independent licensed professional engineer upon completion of closure. Submit one copy of the certification with original signatures and two additional copies.

The hazardous waste container storage area (S01) in the Laboratory Services Building at University of Chicago has been closed in accordance with the specifications in the approved closure plan. A report documenting that closure has been carried out in accordance with the approved plan is attached.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

USEPA ID Number Facility Name

Signature of Owner/Operator Date
Responsible Officer Responsible Officer

Name and Title of Owner/Operator

Signature of Licensed P.E. Date

Name of Licensed P.E. and Illinois License
Number

Mailing Address of P.E.:

Licensed P.E.'s Seal:



THE UNIVERSITY OF CHICAGO
OFFICES OF SAFETY AND ENVIRONMENTAL AFFAIRS
970 EAST 58TH STREET
CHICAGO • ILLINOIS 60637-1475

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RECEIVED
WMD RECORD CENTER

JAN 20 1995

November 14, 1994

RECEIVED
NOV 17 1994

OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

Mr. George Hamper, SHRP-8J
U.S. EPA-Region V, RCRA Permitting Branch
77 W. Jackson Blvd.
Chicago, IL 60604

Dear Mr. Hamper:

This is to provide you with notice of a modification of the University of Chicago's RCRA Part B Permit in accordance with 35 Illinois Administrative Code Section 703.281. The modification that was approved is the designation of the new Primary and Alternate Emergency Coordinators for the University. This modification was necessary do to staff changes. A copy of the modification is attached.

Respectfully,

Steven Beaudoin
Director
Offices of Safety and Environmental Affairs

CONTINGENCY PLAN

Facility Name - Laboratory Service Building
Location - 6041 South Blackstone Avenue
Operator - The University of Chicago

1. General Information

Laboratory Service Building is a receiving point for waste chemicals from research and teaching laboratories of The University of Chicago. Chemicals are received at the facility, sorted and segregated, and stored until a disposal contractor comes on-site to lab pack them. Chemicals are normally received in original containers; usually glass or plastic bottles ranging in size from a few ounces to approximately one gallon. Flammable chemicals may be consolidated into 55-gallon drums for ease of storage and disposal.

The building is a one-story masonry structure without attachment to any other buildings. It is remotely located on the far southeast side of the University campus. The direct access route by vehicles to the building is from East 61st Street or Dorchester Avenue, then to Blackstone Avenue (See Figure 1 and Figure 2).

The building occupies an area of 31 ft. by 38 ft. with finished concrete floor. To the east side of the building there is a fenced yard with a concrete patio. Inside the building it is subdivided into several areas (rooms), including a laboratory, to store chemicals of the same compatibility (Flammable, Reactive, Toxic, and Corrosive) and each room is labeled as such. The floor plan and designation of each area is shown in Figure 3.

2. Emergency Coordinators

Primary Coordinator: Steven Beaudoin
Director
Offices of Safety and Environmental Affairs
The University of Chicago
970 E. 58th Street
Chicago, Illinois 60637
Office Phone: (312) 702-9999
Non-responsive

Alternate Coordinator: Henry DeVries
Life Safety Officer
Offices of Safety and Environmental Affairs
The University of Chicago
970 E. 58th Street
Chicago, Illinois 60637
Office Phone: (312) 702-9999
Non-responsive



State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

USEPA

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/524-3300

B.1.5 Permit Mod
Correspondence
ILD00542136

August 31, 1994

Mr. Steven Beaudoin
Director, Offices of Safety and Environmental Affairs
The University of Chicago
970 East 58th Street
Chicago, Illinois 60637-1475

Re: 0316410001 -- Cook County
University of Chicago
ILD005421136
Received: July 11, 1994 and August 2, 1994
Log No. B-130-M-2
RCRA Permit

Dear Mr. Beaudoin:

This letter is in response to your letters dated July 7, 1994 and July 28, 1994, which were received by the Agency on July 11, 1994 and August 2, 1994, respectively. The subject letters were submitted to notify the Agency about changes in the University of Chicago's staff. More specifically, the emergency coordinators have changed at the university. This change requires a revision of the contingency plan in the university's RCRA Part B permit application, which constitutes a Class 1 modification to the university's RCRA Part B permit (35 Ill. Adm. Code 703.Appendix A, (B)(6)(d)).

Your request to make the aforementioned change is hereby approved subject to the following condition:

1. Pursuant to 35 Ill. Adm. Code 703.281(a)(2), a notice of the modification shall be sent to all persons on the facility mailing list, maintained by the Agency per 35 Ill. Adm. Code 705.165(a)(4), and the appropriate units of State and local government, as specified in 35 Ill. Adm. Code 705.163(a)(5). This notification must be made within ninety (90) calendar days of the date of this letter.

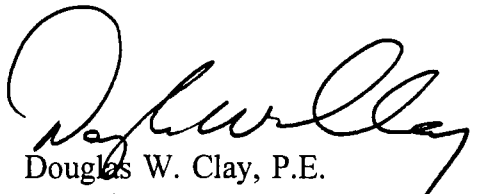
A copy of the revised page 1 of the contingency plan submitted with the July 28, 1994 letter will be inserted in the permit application in the Agency files. The remaining two copies of

Mr. Steven Beaudoin
The University of Chicago (Log No. B-130-M-2)
Page 2

page 1 will be distributed to the Agency's Maywood Regional Office and U.S. EPA's Region 5. Furthermore, a revised cover letter for the permit is enclosed. The RCRA Part B permit is not affected by this change.

Should you have any questions regarding this matter, please contact Hernando Albarracin at 217/524-3264.

Sincerely,


Douglas W. Clay, P.E.
Hazardous Waste Branch Manager
Permit Section, Bureau of Land

DWC:^{HAA}uchib130.m02

^{JKK}
Attachment

cc: USEPA Region V -- George Hamper, w/attachment

cc: May 16 00d
USEPA

JH
U.S.A.

B-130-11-3



THE UNIVERSITY OF CHICAGO
OFFICES OF SAFETY AND ENVIRONMENTAL AFFAIRS
970 EAST 58TH STREET
CHICAGO • ILLINOIS 60637-1475

B.1.2.

July 28, 1994

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SEP 07 1994

Mr. Hernando Albarracin
Permit Section
Division of Land Pollution Control
Illinois Environmental Protection Agency
P.O. Box 19276
Springfield, Illinois 62794-9276

In Re: The University of Chicago, USEPA No. ILD005421136, ✓
IEPA ID No. 0316410001, RCRA Part B-Class 1 Modification

Dear Mr. Albarracin:

Enclosed are three revised copies of Page 1 of the Contingency Plan as you requested.
This is revision five, dated July 28, 1994.

These modifications are the result of changes in staff.

Respectfully submitted,

Steven Beaudoin,
Director, Offices of Safety and Environmental Affairs

RECEIVED
AUG - 2 1994
IEPA-DLPC

CONTINGENCY PLAN

Facility Name - Laboratory Service Building
Location - 6041 South Blackstone Avenue
Operator - The University of Chicago

1. General Information

Laboratory Service Building is a receiving point for waste chemicals from research and teaching laboratories of The University of Chicago. Chemicals are received at the facility, sorted and segregated, and stored until a disposal contractor comes on-site to lab pack them. Chemicals are normally received in original containers; usually glass or plastic bottles ranging in size from a few ounces to approximately one gallon. Flammable chemicals may be consolidated into 55-gallon drums for ease of storage and disposal.

The building is a one-story masonry structure without attachment to any other buildings. It is remotely located on the far southeast side of the University campus. The direct access route by vehicles to the building is from East 61st Street or Dorchester Avenue, then to Blackstone Avenue (See Figure 1 and Figure 2).

The building occupies an area of 31 ft. by 38 ft. with finished concrete floor. To the east side of the building there is a fenced yard with a concrete patio. Inside the building it is subdivided into several areas (rooms), including a laboratory, to store chemicals of the same compatibility (Flammable, Reactive, Toxic, and Corrosive) and each room is labeled as such. The floor plan and designation of each area is shown in Figure 3.

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Offices of Safety and Environmental Affairs
The University of Chicago
970 E. 58th Street
Chicago, Illinois 60637
Office Phone: (312) 702-9999
Non-responsive

Alternate Coordinator: Henry DeVries
Life Safety Officer
Offices of Safety and Environmental Affairs
The University of Chicago
970 E. 58th Street
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Office Phone: (312) 702-9999
Non-responsive

RECEIVED
AUG - 2 1994
IEPA-DLPC

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The building is a one-story masonry structure without attachment to any other buildings. It is remotely located on the far southeast side of the University campus. The direct access route by vehicles to the building is from East 61st Street or Dorchester Avenue, then to Blackstone Avenue (See Figure 1 and Figure 2).

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Alternate Coordinator: Henry DeVries
Life Safety Officer
Offices of Safety and Environmental Affairs
The University of Chicago
970 E. 58th Street
Chicago, Illinois 60637
Office Phone: (312) 702-9999

Non-responsive

RECEIVED

AUG - 2 1994

IEPA-DLPC

CONTINGENCY PLAN

Facility Name - Laboratory Service Building
Location - 6041 South Blackstone Avenue
Operator - The University of Chicago

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970 E. 58th Street
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Life Safety Officer
Offices of Safety and Environmental Affairs
The University of Chicago
970 E. 58th Street
Chicago, Illinois 60637
Office Phone: (312) 702-9999
Non-responsive

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THE UNIVERSITY OF CHICAGO
OFFICES OF SAFETY AND ENVIRONMENTAL AFFAIRS
970 EAST 58TH STREET
CHICAGO • ILLINOIS 60637-1475

July 7, 1994

B.I.Z.

Mr. Lawrence W. Eastep, PE
Manager, Permit Section
Division of Land Pollution Control
Illinois Environmental Protection Agency
P.O. Box 19276
Springfield, Illinois 62794-9276

RECEIVED
WMD RECORD CENTER
SEP 07 1994

In Re: The University of Chicago, USEPA No. ILD005421136,
IEPA ID No. 0316410001, RCRA Part B -Class 1 Modification

Dear Mr. Eastep:

In accordance with 40 CFR 270.42 (a), I am writing to request a Class 1 modification to the University of Chicago's RCRA Part B Permit, to change the Emergency Coordinators, as set forth below.

Page 1 of the Contingency Plan, item 2, Section 2. Emergency Coordinators, should be changed to read as follows:

Primary Coordinator: Steven Beaudoin
Director Offices of Safety and Environmental Affairs
University of Chicago
970 E. 58th Street
Chicago, Illinois 60637
Office Phone: (312) 702-9999

Non-responsive

Alternate Coordinator: Henry DeVries
Life Safety Officer
University of Chicago
970 E. 58th Street
Chicago, Illinois 60637
Office Phone: (312) 702-9999

Non-responsive

RECEIVED

JUL 11 1994

PERMIT SECTION

This modification is the result of changes in staff.

Respectfully submitted,

Steven Beaudoin

Steven Beaudoin
Director, Offices of Safety and Environmental Affairs



Illinois Environmental Protection Agency · P.O. Box 19276, Springfield, IL 62794-9276

217/782-6762

March 31, 1992

David L. O'Leary, Assistant VP
University of Chicago
Operations and Risk Management
970 East 58th Street
Chicago, Illinois 60637

Dr. Sam H. Wang
University of Chicago
Department of Chemistry
5735 South Ellis Avenue
Chicago, Illinois 60637

Re: 0316410001 -- Cook County
University of Chicago
ILD005421136
Log No. B-130-M-1
Received: September 9, 1991
RCRA-Permits

Gentlemen:

The RCRA Part B permit modification request submitted by the University of Chicago has been reviewed by this Agency. Specifically, the Agency is responding to your request to correct a typographical error on page 1 of 5, Form 3, of the Part A permit application, which is found in Section A of your facility's Part B permit application. Correction of a typographical error is classified as a Class 1 permit modification per 35 Ill. Adm. Code Section 703, Appendix A.

Your request to correct the typographical error described above is hereby approved subject to the following conditions.

1. Pursuant to 35 IAC Section 703.281(a)(2), a notice of the modification shall be sent to all persons on the facility mailing list, maintained by the Agency per 35 IAC Section 705.165(a)(4), and the appropriate units of State and local government, as specified in 35 IAC Section 705.163(a)(5). This notification must be made within ninety (90) calendar days of the date of this letter.

Enclosed are a revised RCRA Part B permit, which has been revised to reflect the aforementioned permit modification request, a revised cover letter for your permit, and a copy of the facility mailing list. This letter and the enclosed RCRA Part B Permit should replace the existing RCRA Part B Permit issued by IEPA on July 15, 1991.

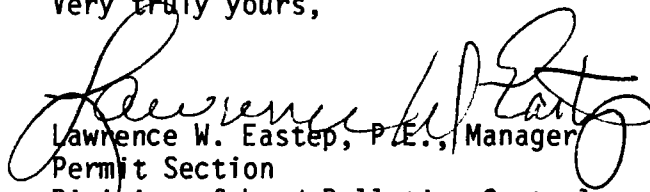


Page 2

Furthermore, the Agency accepts your letter dated September 5, 1991 withdrawing the Class 3 permit modification, which was dated August 16, 1991 and received at the Agency on August 19, 1991.

Should you have any questions regarding this matter, please contact Hernando Albarracin at 217/782-6762.

Very truly yours,


Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control
Bureau of Land

^{ALO}
LWE:HAA:kkw/877r,2-3

Attachments

cc: USEPA Region V - George Hamper, w/attachments ✓

Part B Log No 130-m-1
USEPA
THE UNIVERSITY OF CHICAGO
OPERATIONS

970 EAST 58TH STREET
CHICAGO • ILLINOIS 60637

September 5, 1991

Mr. Lawrence W. Eastep, PE
Manager, Permit Section
Division of Land Pollution Control
Illinois Environmental Protection Agency
P.O. Box 19276
Springfield, Illinois 62794-9276

**RE: The University of Chicago, US EPA No. ILD005421136, IEPA ID
No. 0316410001, RCRA Part B - Class 1 Modification**

Dear Mr. Eastep:

This Class 1 Modification to The University of Chicago's RCRA Part B Permit is submitted, per the request of Mr. Hernando Albarracin of your section, to correct an error in Section A of the approved Part B Permit Application.

Containers of waste chemicals generated at The University of Chicago and affiliated hospitals, are stored in the Laboratory Service Building. The building is a concrete block structure with four rooms used for hazardous waste storage, and two rooms for staging of incoming and outgoing waste. The maximum volume of hazardous and non-hazardous waste that can be stored in the building is 4,600 gallons.

The maximum volume of waste allowed in the RCRA Hazardous Waste, Part B Permit, dated July 15, 1991, was 460 gallons. This was the amount specified in Section A of The University of Chicago's Part B Permit Application. Unfortunately, the amount specified in Section A was a typographical error, and a zero was left off the true maximum storage capacity.

Section D-1a(3)(c) of The University of Chicago's Part B Application, defines the correct allowable volume of the storage rooms as 4,600 gallons. Attached is a revised Part A, Page 1 of 5, which shows the true storage capacity as 4,600 gallons.

Please make this minor modification in The University of Chicago's RCRA Hazardous Waste, Part B Permit. A maximum of 3,700 gallons of waste in the flammable storage room, and 300 gallons of waste in each of the other three storage rooms, should be allowed in the Laboratory Service Building. This is not a request for additional waste capacity, but a correction of Section A of the application, so that it equals the amount defined in Section B of the Part B Permit Application.

RECEIVED

SEP 09 1991

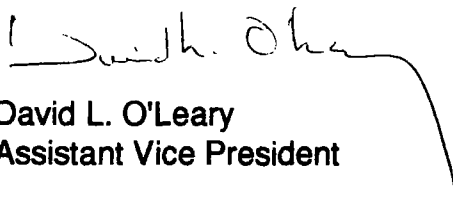
IEPA-DLPC

Division of Land Pollution Control
Illinois Environmental Protection Agency
September 5, 1991

Information required by 35 Illinois Administrative Code, Section 703.181 through 703.185, 703.201 through 703.207, 703.221 through 703.225, and 703.230 can be found in The University of Chicago's Part B Permit Application previously provided to the Illinois Environmental Protection Agency. This permit application was written to comply with these sections.

I certify, under penalty of law, this document, and all attachments, were prepared under my direction or supervision in accordance with a system designed to assure qualified personnel properly gathered and evaluated this information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,



David L. O'Leary
Assistant Vice President

Attachment: Revised Part A, Page 1 of 5

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II. FIRST OR REVISED APPLICATION

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

18 73 74 75 76 77 78

REVISED APPLICATION (place an "X" below and complete item 1 above)

☒ 1. FACILITY HAS INTERIM STATUS ☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

E. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

- | PROCESS | PROCESS CODE | APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY | PROCESS | PROCESS CODE | APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY |
|--------------------------------|--------------|--|---|--------------|--|
| <u>Storage:</u> | | | <u>Treatment:</u> | | |
| CONTAINER (barrel, drum, etc.) | 201 | GALLONS OR LITERS | TANK | T01 | GALLONS PER DAY OR LITERS PER DAY |
| TANK | 202 | GALLONS OR LITERS | SURFACE IMPOUNDMENT | T02 | GALLONS PER DAY OR LITERS PER DAY |
| WASTE PILE | 203 | CUBIC YARDS OR CUBIC METERS | INCINERATOR | T03 | TONS PER HOUR OR METRIC TONS PER HOUR |
| SURFACE IMPOUNDMENT | 204 | GALLONS OR LITERS | | | GALLONS PER HOUR OR LITERS PER HOUR |
| <u>Disposal:</u> | | | <u>OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided: (Item III-C.)</u> | | |
| INJECTION WELL | D79 | GALLONS OR LITERS | | T04 | GALLONS PER DAY OR LITERS PER DAY |
| LANDFILL | D80 | ACRE-Feet (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER | | | |
| LAND APPLICATION | D81 | ACRES OR HECTARES | | | |
| OCEAN DISPOSAL | D82 | GALLONS PER DAY OR LITERS PER DAY | | | |
| SURFACE IMPOUNDMENT | D83 | GALLONS OR LITERS | | | |

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	O	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	S
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	G
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C	DUP	7/1A	C	1	12/1A	12/1B	12/1C		
LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)				1. AMOUNT	2. UNIT OF MEASURE (enter code)	
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
	S 0 1	4,600	G		7				
					8				
					9				
					10				

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THE UNIVERSITY OF CHICAGO
OPERATIONS
970 EAST 58TH STREET
CHICAGO • ILLINOIS 60637

August 16, 1991

Mr. Lawrence W. Eastep, PE
Manager, Permit Section
Division of Land Pollution Control
Illinois Environmental Protection Agency
P.O. Box 19276
Springfield, Illinois 62794-9276

RE: The University of Chicago, US EPA No. ILD005421136, IEPA ID
No. 0316410001, RCRA Part B - Class 3 Modification

Dear Mr. Eastep:

This Class 3 Modification to The University of Chicago's RCRA Part B Permit is submitted, per the request of Mr. Hernando Albarracin of your section, to correct an error on the Part B Permit application.

Containers of waste chemicals generated at The University of Chicago and affiliated hospitals are stored in the Laboratory Service Building. The building is a concrete block structure with four rooms used for hazardous waste storage, and two rooms used for staging of incoming and outgoing waste. The maximum volume of hazardous and nonhazardous waste that can be stored in the building is 4,600 gallons.

The maximum volume of waste allowed in the RCRA Hazardous Waste, Part B Permit, dated July 15, 1991, was 460 gallons. This was the amount specified in Section A of The University of Chicago's Part B Permit Application. Unfortunately, there was a typographical error on the Part A application, and a zero was left off of the true maximum storage capacity.

Section D-1a(3)(c) of The University of Chicago's Part B application, defines the correct allowable volume of the storage rooms as 4,600 gallons. Attached is a revised Part A, Page 1 of 5, which shows the true storage capacity as 4,600 gallons.

Please make this correction in The University of Chicago's RCRA Hazardous Waste, Part B Permit. A maximum of 3,700 gallons of waste in the flammable storage room, and 300 gallons of waste in each of the other three storage rooms, should be allowed in the Laboratory Service Building. This is not a request for additional waste capacity, but a correction of the Part A application so that it equals the amount defined in Section D of the Part B Application.

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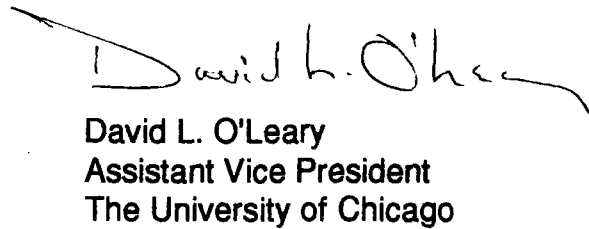
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IEPA-DLPC

Information required by 35 Illinois Administrative Code, Section 703.181 through 703.185, 703.201 through 703.207, 703.221 through 703.225, and 703.230 can be found in The University of Chicago's Part B Permit Application previously provided to the Illinois Environmental Protection Agency. This Permit Application was written to comply with these sections.

I certify, under penalty of law, that this document, and all attachments, were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,



David L. O'Leary
Assistant Vice President
The University of Chicago

Attachment: Revised Part A, Page 1 of 5

Form Approved OMB No. 158-S80004

CONTINUE ON REVERSE

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE +
INCLUDE DESIGN CAPACITY.

T04 - HYDROLYSIS AND NEUTRALIZATION OF SEVERAL TYPES OF CHEMICALS, (ACIDS AND BASES)

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

<u>ENGLISH UNIT OF MEASURE</u>	<u>CODE</u>	<u>METRIC UNIT OF MEASURE</u>	<u>CODE</u>
POUNDS.....	P	KILOGRAMS.....	K
TONS.....	T	METRIC TONS.....	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Notes: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZ. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above